

# SOUTH CAROLINA PROBES THE RELATIONSHIP BETWEEN EMSs AND PERMITTING DECISIONS

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**A**S INDUSTRY'S USE OF systematic approaches to manage environmental obligations grows, the state of South Carolina is undertaking a project to compare the similarities of an environmental management system (EMS) to environmental permitting. The ultimate goal of this study: improved environmental performance.

Broadly defined, an EMS is a tool that provides a systematic approach to managing environmental operations through a "plan-do-check-act" cycle. In April 2004, the U.S. Environmental Protection Agency (EPA) issued a *Strategy for*

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*Determining the Role of Environmental Management Systems in Regulatory Programs.* In it, EPA challenged states to explore ways to incorporate EMS options into the permitting and regulatory structure. In short, EPA was interested in partnering with states to answer the following question: can EMSs be used to improve the efficiency and effectiveness of regulatory tools such as permitting?

## South Carolina Responds to the Challenge

The South Carolina Department of Health and Environmental Control (SCDHEC) responded to this challenge by seeking and receiving an EPA State Innovations Grant to explore the relationship between EMSs and permitting. Currently, the agency recognizes facilities with EMSs through voluntary programs such as the state's environmental leadership program (South Carolina Environmental Excellence Program) and its Environmental Innovations Pilot Program. But a facility EMS does not factor into agency decisions regarding permits issued to the facility. Now, the

agency is studying ways in which facility EMSs may be integrated to help streamline and improve the effectiveness of facility permits as well as enhance overall environmental performance. This is being accomplished through work with four participating facilities to analyze their permit requirements and their EMSs. Due to the special interest that the EPA Office of Solid Waste and Emergency Response has in this project, there is a specific emphasis on the Resource Conservation and Recovery Act (RCRA), and three of the four facilities hold RCRA permits.

The goals of this project are to: improve the overall environmental performance of a facility; explore ways in which permit requirements can be integrated and streamlined based on an EMS; determine how an EMS can help to ensure consistency in the development, issuance, inspection, interpretation, and potential enforcement of a permit, both from a single media and cross-media perspective; and evaluate the potential



benefits of incorporating EMSs as an incentive for permitting options. The final outcome of this project will provide recommendations on ways that an EMS can be used to increase the efficiency and effectiveness of regulatory tools such as permitting, thus yielding improved environmental performance and greater environmental benefits.

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